

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

CHRISTAKIS VRAKAS and LEANN
REED,

Plaintiffs,

v.

UNITED STATES STEEL CORPORATION,
MARIO LONGHI, DAVID B. BURRITT,
and DAN LESNAK,

Defendants.

Civil Action No. 17-579

Judge Cathy Bissoon

**DECLARATION OF GEOFFREY J. RITTS
IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

I, Geoffrey J. Ritts, make this declaration in support of Defendants' Opposition to Plaintiffs' Motion for Class Certification.

1. I am a partner in the law firm of Jones Day and counsel for defendants United States Steel Corporation, Mario Longhi, David Burritt, and Dan Lesnak's (the "Defendants").

2. My business address is North Point, 901 Lakeside Avenue, Cleveland, Ohio 44114-1190.

3. I was admitted *pro hac vice* by this Court on November 21, 2017. My bar identification number is OH 0062603.

4. I certify that attached hereto are, to the best of my knowledge and belief, true and correct copies or excerpts of the following documents:

Exhibit	Date	Document Description
1.	6/18/19	Rebuttal Report of Paul Zurek, Ph.D.
2.	1/27/16	Bank of America Merrill Lynch, <i>FCF burn in 2016E attests to distress; Cutting price objective to \$1 from \$3</i>
3.	11/1/15	Len Boselovic, <i>The outlook for U.S. Steel: bleak and bleaker</i> , Pittsburgh Post-Gazette
4.	2/21/18	2017 Annual Report (Form 10-K) (Excerpts)
5.	4/27/16	Q1 2016 Quarterly Report (Form 10-Q) (Excerpts)
6.	7/26/17	Q2 2017 Quarterly Report (Form 10-Q) (Excerpts)
7.		United States Steel Corporation Common Stock Closing Prices vs. Market and Industry Indices, 1/27/16–12/29/17, Source: Bloomberg
8.	5/23/19	Deposition of Christakis Vrakas (Excerpts)
9.	6/4/19	Deposition of Michael L. Hartzmark, Ph.D. (Excerpts)
10.	4/25/19	Deposition of Leeann Tiris Reed (Excerpts)
11.	3/14/19	Email from Shannon L. Hopkins

5. Based upon the foregoing, I respectfully submit the attached documents as Exhibits to the Defendants' Opposition to Plaintiffs' Motion for Class Certification.

6. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: June 18, 2019

/s/ Geoffrey J. Ritts

Geoffrey J. Ritts